

## **HRL EXHIBIT 3**

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October 26, 2018

**VIA EMAIL AND U.S. MAIL**

W. Joseph Bruckner  
LOCKRIDGE GRINDAL NAUEN P.L.L.P.  
100 Washington Avenue South, Suite 2200  
Minneapolis, MN 55401

**Re: In re Pork Products Antitrust Litig. (D. Minn.)**

Dear Mr. Bruckner:

This letter constitutes the response of Hormel Foods Corporation ("Hormel" or "Company") to the letter that plaintiffs' counsel in the above-listed action sent to me on July 19, 2018, requesting that Hormel take certain information-preservation steps with regard to personal device data of five "Identified Senior Executives" of the Company. In response to that request, to the extent the Identified Senior Executives were not previously under a legal hold with regard to this matter, they were placed on legal hold, which will preserve their communications and data on Company-owned computers and other devices. Additionally, preservation letters were sent to the Company's telecommunications providers.

Hormel does not purchase or otherwise pay for cell phones or other personal devices of Company employees, including the Identified Senior Executives. Based on our investigation following receipt of your July 19 letter, there is no reason to believe that any information potentially relevant to this lawsuit uniquely resides on any personal devices of the Identified Senior Executives (work-related emails would also reside on Company data storage devices), and we are aware of no general obligation under the Federal Rules of Civil Procedure to forensically image personal devices of Company personnel. Nonetheless, Hormel will work with a vendor to have the personal cell phones of the Identified Senior

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Executives imaged, and anticipates having that work completed by November 15, 2018. This action is being taken without conceding that there is any data contained on those cell phones that would be relevant to this case and without waiving any argument or objection about the propriety of discovery directed to those devices.

Very truly yours,

A handwritten signature in black ink, appearing to read "Richard A. Duncan", written over a horizontal line.

Richard A. Duncan

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